

Dear State and Local Agency Partners:

We wanted to make you aware of some recent developments regarding plans to develop the 2011 National Emissions Inventory, version 2 (2011NEIv2) onroad mobile source emissions and an accompanying modeling platform based on the 2011NEIv2. At a high level, we wanted to make you aware that onroad mobile source emissions for the 2011NEIv2 will be developed using MOVES2014. Therefore, MOVES2014 compatible databases will be developed as part of the 2011NEIv2 effort. In addition, Source Classification Codes (SCCs) for onroad mobile sources in the 2011NEIv2 will be revamped to more easily map to the MOVES vehicle and road types. In this letter we provide additional information on:

- 1) our plans for integrating newly available default data with state-supplied data for onroad mobile sources in the 2011NEIv2;
- 2) how you can provide comments on representative counties in the 2011NEIv2;
- 3) how you can provide comments on activity data to be used for developing the extended idle emissions in the 2011NEIv2;
- 4) how you can submit onroad mobile source inputs for the 2018 modeling platform, if desired; and
- 5) our plans for providing the MOVES2014 CDBs used in the 2011NEIv2 development, along with emission summaries.

1. Data hierarchy for 2011NEIv2 onroad mobile sources

EPA is preparing a set of MOVES 2014 county databases (CDBs) for use in the creation of 2011NEIv2. Although many state and local agencies have provided 2011 CDBs, EPA must generate default information for counties that were not submitted. The Coordinating Research Council (CRC) has funded a project (A-88) to generate state-specific data for use in counties for which state/local provided data is not available. (More information on the CRC is available from <http://www.crcao.org/>.) EPA intends to use data output from the CRC A-88 project rather than generating national average default values as we have done in the past. Because the CRC state-specific data will not be available soon enough to allow states an opportunity to review the final CDBs prior to their use in creating the 2011NEIv2, we wanted to make you aware of our plans for reconciling data from the various sources.

EPA intends to reconcile the various sources of data that could be used to create the 2011NEIv2 onroad mobile source emissions as follows:

- EPA intends to use local data in the CDBs provided by states/locals as submitted, with the exception of the fuel properties. EPA has been processing proprietary data regarding gasoline fuel properties provided by gasoline refineries for calendar year 2011 to generate a set of regional fuels. EPA intends to use these fuels for the 2011NEIv2 in preference to fuel estimates from states. EPA will make these regional fuels and the list of counties that use them available to the states once they become available. All other non-default tables (except meteorological data) in the submitted CDBs will be used unless EPA's quality assurance checks reveal a problem with the specific table.

- Counties for which data has not been provided by state and local agencies will use EPA default data generated by the CRC A-88 Project, in preference to EPA national default values where available and appropriate. This includes the county estimates for vehicle miles traveled (VMT), vehicle populations, and age distributions. These default values include some county-specific data from previous versions of the NEI that have been carried forward.
- If states/locals submitted CDBs in which some of the tables used EPA defaults, EPA is planning on using the CRC A-88 Project state specific data to replace those default tables. In this case, EPA is assuming that the use of EPA defaults indicates that states do not have county-specific data for that input. Therefore, EPA will plan to use appropriate state specific data from the CRC A-88 Project in preference to EPA default data in the state submitted CDBs. Note, only tables that used EPA defaults would be replaced and the state/local specific submitted data would not be changed.

If you prefer that EPA continue to use the older default data for your state rather than the CRC A-88 project data, please notify EPA of this as soon as possible by sending email to mobile@epa.gov with a cc to driver.laurel@epa.gov.

2. Updates to representative counties for 2011NEIv2

EPA will continue to use the representative counties approach to compute onroad mobile source emissions in 2011NEIv2. This spreadsheet shows the final representative counties for 2011NEIv1:

http://www.epa.gov/ttn/chief/emch/2011v6/outreach/2011_Representing_Counties_List_20130823.xlsx

This map shows the almost final set of representative counties for 2011NEIv1 (note that minor changes to New York and North Carolina included late in the 2011NEIv1 process are not shown):

http://www.epa.gov/ttn/chief/emch/2011v6/outreach/2011_platform_ref_county_groups_count_update_jun13.png

EPA is working to incorporate some additional considerations into the selection of representative counties for 2011NEIv2, such as ramp fractions. If you have specific suggested changes to the representative counties used for your state that would cause them to differ from those used to compute 2011NEIv1, please send email describing these changes to the following contacts:

brzezinski.david@epa.gov, zubrow.alexis@epa.gov, eyth.alison@epa.gov.

If you choose, you may also submit a note to the 2018 emissions modeling platform docket (<http://www.regulations.gov/#!docketDetail;D=EPA-HQ-OAR-2013-0809>) to ensure your request is documented, but please do not wait until June 30 to provide this information because the MOVES2014 runs for the 2011NEIv2 are scheduled to start in June. Please submit updates to representative counties by May 31, 2014 to ensure they will be used in the 2011NEIv2.

3. Updates to activity data to compute 2011 emissions from extended idling of diesel long-haul trucks

For the 2011NEIv2, EPA will be using a new method in MOVES 2014 to calculate extended idle hours and emissions for diesel long haul combination trucks. EPA will post the data file containing draft extended idle hours for each county derived using the new method to the 2011 area of the CHIEF Emissions Modeling Clearinghouse web site (<http://www.epa.gov/ttn/chief/emch/index.html#2011>) in early May. These draft hours will be developed based on the VMT used in the 2011NEIv1. EPA is offering an opportunity for states to provide their own estimate of the total annual hours of extended idling by diesel long haul trucks in each county for use in the 2011NEIv2 calculations. States/locals may resubmit this data file in the same format, but with updated values for extended idle hours in their areas of responsibility, to our mobile sources email address (mobile@epa.gov) with cc's to 2011NEIv2 onroad mobile source data contacts: brzezinski.david@epa.gov, zubrow.alexis@epa.gov, and eyth.alison@epa.gov.

Please submit updates to extended idle hours by May 31, 2014 to ensure they will be used in the 2011 NEI v2. If states/locals do not provide estimates of extended idle hours, EPA will use default methods to generate the extended idle hours based on the 2011NEIv2 VMT that will be consistent with the state/locals submissions. In concert with this effort, EPA is working on developing methods to properly spatially allocate the extended idle emissions to areas where trucks idle, such as truck stops and rest areas.

4. Submission of 2018 MOVES Inputs

As announced in the Federal Register Notice on the Availability of the 2018 Emissions Modeling Platform (EPA-HQ-OAR-2013-0809-0001), EPA is accepting emissions inputs for the year 2018 until June 30, 2014. For onroad mobile sources, EPA is requesting inputs in the form of MOVES2010b county databases (CDBs), which should be submitted to EPA's Emission Inventory System (EIS) **between May 1, 2014 and June 30, 2014**. EIS will be specially configured to accept the onroad mobile inputs for 2018 during this period. When you submit these emissions, please ensure that the emissions data year is set to 2018 in the EIS submission files. Questions on the submission of 2018 CDBs to EIS may be directed to Laurel Driver (driver.laurel@epa.gov).

Please note: **any other type of 2018 emissions modeling platform data must be submitted to the docket** (<http://www.regulations.gov/#!docketDetail;D=EPA-HQ-OAR-2013-0809>), **including fully processed onroad emissions**. This is because EIS cannot accept future year emissions – it can only accept the future year MOVES CDBs. If you submit CDBs to EIS, please also provide a short submission to the docket that describes what was submitted to the EIS.

When you submit the CDBs, please submit complete CDBs that include all tables needed to run MOVES – as you did when you submitted CDBs for the 2011 NEI. We suggest you start with the 2011 databases and update them with 2018 data. EIS will not accept the submissions if all tables are not included. Also, please run the MOVES CDB QA tool on your CDBs – it is available at <http://www.epa.gov/ttn/chief/net/2011inventory.html> under Onroad mobile resources. The QA tool was updated in March, 2014 to perform additional QA checks and to add some flexibility where appropriate. With your submission, please include an updated version of the national county checklist that indicates

which tables have been updated for each county **as compared to your 2011 submitted CDBs** so we have an idea of what tables have changed. The template for this checklist is here:

http://www.epa.gov/ttn/chief/eis/2011nei/national_county_checklist.xlsx

For example, if you changed a large number of tables from the defaults in 2011, but for 2018 you only changed the tables HPMSVtypeyear, source type population, and road type distribution, just indicate that those three tables were updated. At this time, we plan to continue to use an approach that uses representative counties in the same manner as was done for 2011NEIv1. So, any submitted CDBs should have data specific to the counties they represent, not data that is averaged or aggregated over a set of counties.

EPA is particularly interested in getting updates to future vehicle miles traveled (VMT), vehicle population (VPOP), and inspection and maintenance (I/M) programs. The MOVES2010b-style CDBs will be converted to MOVES2014 CDBs by EPA after submission, and the activity data will be translated to the new SCCs to be used in 2011NEIv2. These new SCCs will be compatible with the vehicle types, road types, and processes used in MOVES 2014.

Hours of extended idle inputs may be provided in the same format as those for 2011 by zipping them up with the CDBs as supporting documentation. If you are only providing extended idle inputs for 2018 without any CDBs, please submit those as an attachment to the docket as a .txt file.

5. Finalization of 2011NEIv2 Onroad mobile sources

Once the 2011NEIv2 development has been completed, all of the CDBs will be provided back to the community, updated with the actual data used in the modeling, and in MOVES2014 format. Summaries of the emissions data will be provided as soon as they become available.

We would like to thank the agencies that have submitted data to the NEI. We believe that participation by state and local agencies in the development of the NEI has greatly improved our inventory estimates, not only for the NEI, but for the modeling platform that EPA uses to develop regulations. We appreciate the patience that states have shown in working with us to develop the best possible set of data for the modeling, given the constraints of time and resources. We look forward to continuing to develop our databases and methods in cooperation with your agencies.

If you have any questions on any of the above information, please contact Alison Eyth (eyth.alison@epa.gov) and she will be sure your question gets to the party who can answer it.